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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Nicoleta Maria Tulai,

Plaintiff,

V.

Merrick Garland, Attorney General of the United States of America; Alejandro Mayorkas, Secretary of Department of Homeland Security; Ur Jaddou, U.S. Citizenship and Immigration Services; Richard T. Murray, Field Office Director, Reno Field Office U.S. Citizenship and Immigration Services.

Defendants.

Case No. 3:23-cv-00351-LRH-CLB

Order Granting Stipulation to Extend the United States' Deadline to Answer or otherwise respond to Plaintiff's Petition for De Novo Review of Denial of N-400 Application for Naturalization [ECF No. 1]

(First Request)

Plaintiff, Nicoleta Maria Tulai, through counsel, and the United States of America, on behalf of Federal Defendants, through counsel, hereby agree and stipulate to extend the deadline to answer or otherwise respond to Plaintiff's Petition for De Novo Review of Denial of N-400 Application for Naturalization by 30 days, until **February 1, 2024**. The parties enter into this stipulation based on the following:

1. Plaintiff filed her Petition on July 14, 2023 (ECF No. 1).
 2. Plaintiff served the United States with a copy of the Summons and Petition
on September 6, 2023.
 3. The current deadline for Federal Defendants to answer or otherwise respond
is January 2, 2024.

4. Since the filing and serving of the Petition, the parties have engaged in discussions that may resolve the issues in this case without the Court's intervention. The requested 30-day extension will allow the parties additional time to work with their clients to allow additional discussion. Should the parties be able to resolve the matter without further litigation, a dismissal will follow. Should the parties be unable to resolve the matter without Court intervention, Federal Defendants will move forward with responding to Plaintiffs' Petition on or before **February 1, 2024**. Accordingly, the parties believe good cause exists for the extension in the interest of judicial economy and the parties' resources.

Therefore, the United States requests that the Court extend the deadline for the United States to answer or otherwise respond to February 1, 2024.

Respectfully submitted this 2nd day of January 2024.

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IT IS SO ORDERED:


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DATED: January 2, 2024